

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,

Plaintiffs,

v.

LANCIUM LLC, MICHAEL T.  
MCNAMARA, and RAYMOND E. CLINE,  
Defendants.

C.A. No. 21-534-MN

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants Lancium LLC, Michael McNamara and Raymond E. Cline (“Defendants”) respectfully move, pursuant to Fed. R. Civ. P. 56, for summary judgment on all of Plaintiffs’ claims. Specifically, Defendants move for summary judgment (1) dismissing Plaintiffs’ claim to correct inventorship such that Austin Storms is the sole inventor of the patent-at-issue (Count I), (2) dismissing Plaintiffs’ alternative claim to correct inventorship such that Austin Storms is a joint invention of the patent-at-issue (Count II), and (3) finding that Plaintiffs’ claim for conversion (Count V) fails as a matter of law.

This Motion is based on the accompanying Opening Brief, the Declaration of Adam Kaufmann in Support of Defendants’ Motion for Summary Judgment, the exhibits attached thereto, cited pleadings on file with the Court in this action, and on any other materials or evidence that may be presented to the Court.

Dated: June 15, 2022

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